

FILED

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

GCORP INTERNATIONAL, INC., :

Plaintiff, :

v. :

CELCITE MANAGEMENT SOLUTIONS :

LLC, :

AMDOCS, INC., and :

NADEEM HAIDER. :

Defendants. :

2015 FEB 13 A 11:26

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Civil Action No. 1:15CV204

(Circuit Court of Fairfax County, VA

Case No. 2015-00621)

AJT/JFA

NOTICE OF REMOVAL

Defendants Celcite Management Solutions, LLC, Amdocs, Inc. and Nadeem Haider, by counsel, remove the above-styled matter to this Court from the Circuit Court of Fairfax County, Virginia, pursuant to 28 U.S.C. §§ 1441 and 1446.

FAIRFAX CIRCUIT COURT PROCEEDINGS

1. Plaintiff GCorp International, Inc. filed a Complaint in the Circuit Court of Fairfax County against Amdocs, Inc., Celcite Management Solutions, LLC and Nadeem Haider on January 15, 2015.
2. Defendants, by counsel, agreed to accept service for all Defendants effective January 26, 2015, such that no service of process was necessary.
3. This Notice of Removal is timely filed within 30 days of January 26, 2015, when the Defendants were served with the Complaint.

BASIS FOR REMOVAL

4. Plaintiff GCorp International, Inc. is a corporate entity existing under the laws of the State of Texas.

5. Defendant Celcite Management Solutions, LLC is a limited liability company formed under Delaware law with a principal place of business in Herndon, Virginia.

6. Defendant Amdocs, Inc. is a corporation formed under Delaware law with its principal place of business in Chesterfield, Missouri.

7. Defendant Nadeem Haider is a natural person residing in Georgia.

8. Complete diversity exists between the Plaintiff and the Defendants.

9. Plaintiff's Complaint seeks damages in excess of \$75,000.00 exclusive of interest and costs.

10. Accordingly, this Court has removal jurisdiction based on diversity of citizenship over this action pursuant to 28 U.S.C. §§ 1332 and 1441 (b).

11. The Alexandria Division of this Court embraces the place where the action being removed is pending. Therefore, removal to this Court is proper under 28 U.S.C. §§ 1441(a) and 1446 (b).

12. Defendants' removal of this action is timely pursuant to 28 U.S.C. § 1446(b)(1), because the Defendants have filed this Notice of Removal within 30 days after service of the Complaint.

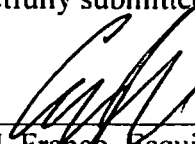
13. All Defendants in this action have joined in the removal of this action pursuant to 28 U.S.C. § 1446(b)(2).

14. Removal based on diversity of citizenship is proper under 28 U.S.C. § 1446(c) because the amount in controversy, as demanded in the Complaint, exceeds \$75,000.

15. Attached to this Notice of Removal is a copy of the process served upon the Defendants to date.

16. Pursuant under 28 U.S.C. § 1446(d), a copy of this Notice of Removal will be filed promptly with the Office of the Clerk of the Circuit Court of Fairfax County, Virginia, and written notice of removal will be provided promptly to counsel of record for the Plaintiff.

Respectfully submitted,

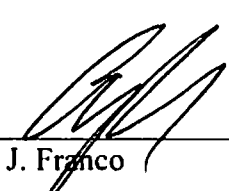


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Counsel for Defendants.

CERTIFICATE OF SERVICE

I certify that on February 13, 2015, a true and correct copy of the foregoing was served, via first-class mail, postage prepaid, upon the following counsel:

Lee E. Berlik, Esq.
Jay M. McDannell, Esq.
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Craig J. Franco